



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

November 27, 2007

Mike Gravel, Treasurer  
Mike Gravel for President 2008  
1600 North Oak Street, Number 1412  
Arlington, VA 22209

**Response Due Date:**  
**December 28, 2007**

Identification Number: C00423202

Reference: October Quarterly Report (7/1/07 - 9/30/07)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 4 items:

1. Schedule A-P of your report discloses one or more contributions that appear to be from a corporation(s) and/or labor organization(s) (see attached). 2 U.S.C. § 441b(a) prohibits the receipt of contributions from corporations and labor organizations unless made from separate segregated funds established by the corporations and labor organizations.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information.

If you have received prohibited contributions, you must make a refund. (11 CFR § 103.3(b)(1)) The refund must be made within thirty (30) days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(2))

Please inform the Commission of your corrective action immediately and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B-P supporting Line 28(a) of the report

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covering the period in which the refund was made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action, prompt action by you to refund the prohibited amount will be taken into consideration.

2. Schedule D-P of your report discloses outstanding debts owed to your committee. The purposes listed with these debts indicate that these debts are for "donations not received" from entities such as "Paypal." It is unclear whether these outstanding contributions are from individuals making payments through these entities, or whether the contributions are from the entities listed on Line 11. Please amend your report to clarify the nature of the debts owed to the committee. (11 CFR § 104.11(b))

When your committee receives payments for these debts, each payment must be disclosed on Schedule A-P. In addition, each individual contribution must be itemized as a memo entry when the individual's total contributions to your committee aggregate over \$200 per election cycle. (11 CFR § 104.3(a)(4)(i)) This itemization must include the contributor's full name, address, occupation, employer, and the date that the committee received the contribution. (11 CFR § 100.12) If none of the contributors aggregates to over \$200 during the election cycle, you must indicate this on an amendment to your report.

Please amend your report to explain the nature of the debts owed to the committee listed on Schedule D-P and to disclose the original contributor information on Schedule A-P for these payments.

3. Some of the contributions itemized on Schedule A-P of your report have incorrect values in the "Election Cycle-to-Date" field. This field should show the total amount that the committee received from the contributor in the current election cycle, from 11/3/04 through the date of receipt of the contribution. (11 CFR § 104.3(a)(3))

It appears that some of the names you have disclosed on Line 17(a) of Schedule A-P are entered into your database as "last name, first name" while others are entered as "first name, last name." Entering names in different formats prevents your database from properly

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aggregating contributions from the same individual or entity. Please amend your report to disclose names in a consistent format.

4. Schedule A-P of your report discloses earmarked contributions through a conduit. Please be reminded that when a committee receives an earmarked contribution(s) through an allowable conduit, each individual contribution must be itemized when the individual's total contributions to your committee aggregate over \$200 per election cycle. This itemization must include the full name, address, occupation, and employer of the individual contributor along with the date the contribution(s) was received by the conduit. Any un-itemized contributions received through the conduit must be included in your totals on Line 11(a)(ii) of the Detailed Summary Page.

In addition, information regarding the conduit or intermediary for each contribution must be itemized on Schedule A-P as a memo entry. The conduit's full name and address (and occupation and employer if the conduit is an individual) must also be provided, along with the date the contribution(s) was received by your committee and the total amount of earmarked contributions received from the conduit.

Please amend your report to disclose the proper format for earmarked contributions received from a conduit or intermediary. You can refer to the FEC Campaign Guide for Congressional Candidates and Committees for further guidance on how to report earmarked contributions through a conduit (11 CFR § 110.6(c)(2))

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please

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contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1169.

Sincerely,

A handwritten signature in cursive script that reads "Lauren Lien".

Lauren Lien  
Campaign Finance Analyst  
Reports Analysis Division

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Excessive and/or Prohibited Contributions  
Mike Gravel for President 2008 (C00423202)  
October Quarterly Report (7/1/07 - 9/30/07)

P = Primary Election  
G = General Election

CONTRIBUTOR NAME		DATE	AMOUNT	ELECTION
CafePress		9/25/2007	\$41.65	P2008
Fundraising, Cash		7/3/2007	\$241.00	P2008
Fundraising Café Press		8/23/2007	\$51.12	P2008
Nova Information Systems		7/2/2007	\$825.00	P2008
Paypal Inc		7/5/2007	\$1,695.22	P2008

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